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808 Holdings, LLC

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION**

808 HOLDINGS, LLC, a corporation,

Plaintiff,

vs.

COLLECTIVE OF DECEMBER 30, 2011  
SHARING HASH  
E37917C8EEB4585E6421358FF32F29CD63  
C23C91, and DOES 1 through 54, inclusive,

Defendants.

Case No.: 3:12-CV-215-MMA-RBB

**NOTICE OF MOTION AND MOTION FOR  
LEAVE TO TAKE EARLY DISCOVERY**

Plaintiff 808 Holdings, LLC respectfully moves this Court to issue an Order granting leave to take immediate discovery. Plaintiff is unable to obtain a stipulation for this Motion because there are no identified defendants and Plaintiff is unable to identify the Doe Defendants until the requested discovery takes place. Plaintiff moves for this Order so that it may discover the identities of certain Doe Defendants from their respective Internet Service Providers ("ISPs"). This Motion is based on the attached Memorandum of Points and Authorities.

DATED: February 1, 2012

LANG, HANIGAN & CARVALHO, LLP.

By s/ Arthur Carvalho, Jr.  
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